IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143 Honorable T.S. Ellis, III

Pretrial conference: May 7, 2021

Trial: July 12, 2021

MOTION TO SEAL EXHIBIT 1 OF DEFENDANT'S SUPPLEMENT TO MOTION FOR LEAVE TO FILE RULE 12.2(B) NOTICE OF EXPERT EVIDENCE OF A MENTAL CONDITION BEARING ON LACK OF GUILT (ECF 299)

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting Exhibit 1 of his Supplement To Motion For Leave To File Rule 12.2(B) Notice Of Expert Evidence Of A Mental Condition Bearing On Lack Of Guilt (ECF 299) to be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

ZACKARY ELLIS SANDERS By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May 2021, the foregoing was served electronically on counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Nina Ginsberg